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REYES QUINONEZ, JR  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 REYES QUINONEZ, JR,

15 Defendant.  
16

Case No. 1:23-cr-00054-JLT-SKO

**STIPULATION TO CONTINUE STATUS  
CONFERENCE; ORDER**

Date: February 7, 2024

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Reyes Quinonez, Jr., that the status conference  
20 currently scheduled for December 6, 2023, at 1:00 p.m. may be continued to February 7, 2024, at  
21 1:00 p.m.

22 The parties agree and stipulate, and request that the Court find the following. The parties  
23 have initiated discussions to resolve this case. The defense is in need of additional time to  
24 investigate issues relating to the guideline calculation in the case. The parties then anticipate  
25 having further plea negotiations regarding this matter. The parties believe that the requested  
26 continuance will enable the parties to undertake the necessary plea negotiations in the case. The  
27 requested continuance will also conserve time and resources for the parties and the Court.  
28 Counsel for defendant believes that failure to grant the above-requested continuance would deny

1 him the reasonable time necessary for effective preparation, taking into account the exercise of  
2 due diligence. The government does not object to the continuance.

3 Based on the above-stated findings, the ends of justice served by continuing the case as  
4 requested outweigh the interest of the public and the defendant in a trial within the original date  
5 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial  
6 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of December  
7 6, 2023, to February 7, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. §§  
8 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by  
9 the Court at defendant's request on the basis of the Court's finding that the ends of justice served  
10 by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

11 Respectfully submitted,

12  
13 PHILLIP A. TALBERT  
United States Attorney

14 Date: November 29, 2023

15 /s/ Justin Gilio  
JUSTIN GILIO  
Assistant United States Attorney  
Attorney for Plaintiff

16  
17 HEATHER E. WILLIAMS  
Federal Defender

18  
19 Date: November 29, 2023

20 /s/ Reed Grantham  
REED GRANTHAM  
Assistant Federal Defender  
Attorney for Defendant  
REYES QUINONEZ, JR.

**ORDER**

**IT IS SO ORDERED.** The time period to February 7, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial. The status conference currently scheduled for December 6, 2023, at 1:00 p.m. is hereby continued to February 7, 2024, at 1:00 p.m.

Date: 11/29/23

Sheila K. Oberto

Hon. Sheila K. Oberto  
United States Magistrate Judge